

Richard Katz
Pro se plaintiff
3364 Parker Lane
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(570) 517-9314
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January 24, 2016

Michael E. Sacks
1601 Market Street, Suite 3310
Philadelphia, PA 19103-1443
(215) 255-8590
Facsimile: (215) 255-8583
sacksme@hamburg-golden.com

Re: Richard Katz v. NBME, et al.

Civil Action No. 3:15-cv-1187

Dear Michael:

I have made the following annotations directly to your letter (attached) as this seemed like the most logical and most efficient method of highlighting responses to the issues in this case that you have effectively articulated.

I will follow up with a phone call to you Monday morning 01/25/2016 around 10:00 AM to discuss the annotations made herein. Based on the degree of compromise we can agree upon I have no problem withdrawing my objection filed with the Court on January 19, 2016, entitled "Plaintiff's Objection to Defendant's Proposed Subpoena for Production of Medical Records."

It is my hope that we can reason together and an amicable resolution can be mutually agreed upon.

Sincerely,

/s/ Richard Katz
Richard Katz
Pro se

Richard Katz
Pro se plaintiff
3364 Parker Lane
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January 20, 2016

Michael E. Sacks
1601 Market Street, Suite 3310
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sacksme@hamburg-golden.com

Re: Richard Katz v. NBME, et al.

Civil Action No. 3:15-cv-1187

Dear Michael:

I am adding additional proposed subpoenas to the ones that I provided to you yesterday. Pursuant to Fed. R. Civ. P. 45(a)(4), I am providing notice to you that I intend to serve the enclosed subpoenas on January 26, 2016. The subpoena seeks records relating to previous or current employees of NBME Disability Services.

The subpoena is directed to:

- Maria L. Fuentes
- Gregory Baker

Also, I submitted an objection to the Court yesterday regarding your proposed subpoenas on the grounds that they seek irrelevant and privileged information, that the information they seek is overbroad, that it seeks information that could be used to invade Katz's privacy and safety.

It was brought to my attention that you contacted Dr. Hamidian from the Aaron Center by telephone yesterday inquiring if you could mail her via regular mail the subpoena. Such tactics are overreaching.

Almost all documents pertinent to this case have already been uploaded to the Court docket and are readily available to you.

Sincerely,

/s/ Richard Katz

Richard Katz

Pro se

Richard Katz
Pro se plaintiff
3364 Parker Lane
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January 19, 2016

Michael E. Sacks
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Re: Richard Katz v. NBME, et al.

Civil Action No. 3:15-cv-1187

Dear Michael:

In my letter dated January 11, 2016, I requested that authorizations for the release of employment records for the following individuals stated below be signed and returned to me. To date I have not received the signed authorizations from you. Please sign and return the authorizations to me at your earliest convenience. If you do not intend to sign the authorizations voluntarily, please let me know so I can address this issue with the Court.

Catherine Farmer, Psy.D.
Director, Disability Services and
ADA Compliance Officer, Testing Programs

National Board of Medical Examiners
3750 Market Street
Philadelphia, PA 19104-3190
Telephone: (215) 590-9700
Facsimile: (215) 590-9422
E-mail: disabilityservices@nbme.org

Gerard F. Dillon, Ph.D.
Vice President, Licensure Program
National Board of Medical Examiners
3750 Market Street
Philadelphia, PA 19104-3190

Email: gdillon@nbme.org
Phone: 215.590.9500

Additionally, I am now requesting the employment file from NBME for:

J. Abram Doane, MA, MHA, JD *
Coordinator, Office for Academic Success
Salus University
8360 Old York Road
Room W-326-C
Elkins Park, PA 19027

Email: oas@salus.edu
Phone: 215-780-1314
Fax: 215-780-1523

Sincerely,

/s/ Richard Katz
Richard Katz
Pro se